

(Stipulating Parties Listed on Signature Pages)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULING**

ALL INDIRECT PURCHASER ACTIONS;

Electrograph Sys., Inc. v. Hitachi, Ltd., No. 11-cv-01656;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Best Buy Co., Inc. v. Hitachi, Ltd., No. 11-cv-05513;

Target Corp. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514;

Interbond Corp. of Am. v. Hitachi, Ltd., No. 11-cv-06275;

Office Depot, Inc. v. Hitachi, Ltd., No. 11-cv-06276;

CompuCom Sys., Inc. v. Hitachi, Ltd., No. 11-cv-06396;

Costco Wholesale Corp. v. Hitachi, Ltd., No. 11-cv-06397;

P.C. Richard & Son Long Island Corp. v. Hitachi, Ltd., No. 12-cv-02648;

Schultze Agency Servs., LLC v. Hitachi, Ltd., No. 12-cv-02649;

Tech Data Corp. v. Hitachi, Ltd., No. 13-cv-00157;

Sharp Elecs. Corp. v. Hitachi, Ltd., No. 13-cv-01173;

Dell Inc. v. Hitachi Ltd., No. 13-cv-02171;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776;

State of California v. Samsung SDI Co., LTD., No. CGC-11-515784.

WHEREAS, the Indirect Purchaser Plaintiffs (“IPPs”), the Direct Action Plaintiffs (“DAPs”), the California Attorney General,¹ and the undersigned Defendants² agree that a modest modification of the case schedule will ultimately aid in the efficient resolution of the litigation;

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the IPPs, counsel for the DAPs, and counsel for the undersigned Defendants in the above-captioned actions as follows:

SCHEDULE

April 15, 2014	Last day for IPPs, DAPs and the California Attorney General to serve opening expert reports on the merits; last day for Defendants to serve opening expert reports on affirmative defenses;
July 3, 2014	For any depositions noticed, but not yet taken, by April 15, 2014, the Parties may supplement their opening reports to the extent that the supplements are limited to evidence that is elicited during such depositions;
August 5, 2014	Last day for Defendants to serve opposition expert reports on the merits; last day for IPPs, DAPs and California Attorney General to serve opposition expert reports on affirmative defenses;
September 5, 2014	Close of fact discovery;
September 23, 2014	Last day for IPPs, DAPs and California Attorney General to serve rebuttal expert reports on the merits; last day for Defendants to serve rebuttal expert reports on affirmative defenses;

¹ The California Attorney General joins in this stipulation, but only insofar as it concerns the close of fact and expert discovery on Defendants and the date of expert reports.

² The following Defendants do not join in this stipulation: Technicolor SA (f/k/a Thomson SA), Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.), Mitsubishi Electric Corporation, Mitsubishi Digital Electronics America, Inc., and Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric and Electronics, USA, Inc.). The Court ruled only last week on the motions to dismiss filed by the Thomson and Mitsubishi defendants. Having not been parties to the previous scheduling orders in these matters, they obviously need to work with their clients, plaintiffs and the Court to determine the schedule going forward and therefore do not join in this stipulation at this time.

1	October 31, 2014	Last day for Defendants to serve sur-rebuttal expert reports on the
2		merits; last day for IPPs, DAPs and California Attorney General to
3		serve sur-rebuttal expert reports on affirmative defenses;
4	November 7, 2014	Last day to file dispositive motions;
5	December 5, 2014	Last day to file pre-trial Daubert motions (parties may decide to
6		reserve these motions for trial if they desire to do so);
7	December 5, 2014*	Plaintiffs' exchange of trial exhibits, deposition excerpts, and
8		witness lists (with objections, including objections to translations);
9	December 23, 2014	Last day to file oppositions to dispositive motions;
10	January 9, 2015*	First simultaneous exchange of jury instructions and special verdict
11		forms;
12	January 16, 2015	Last day to file oppositions to pre-trial Daubert motions;
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14	January 23, 2015	Last day to file replies in support of dispositive motions;
15	January 23, 2015*	Last day for filing motions in limine and other non-dispositive pre-
16		trial motions;
17	January 26, 2015*	Second simultaneous exchange of jury instructions and special
18		verdict forms;
19	January 29, 2015*	Defendants' exchange of trial exhibits, deposition excerpts, and
20		witness lists (with objections, including objections to translations);
21	January 30, 2015*	Last day to meet and confer re pre-trial order;
22	February 6, 2015*	Last day for parties to exchange proposed exhibits and witness lists;
23		file pretrial order, agreed set of jury instructions, and verdict forms
24	February 9, 2015	Last day to file replies in support of pre-trial Daubert motions;
25	February 13, 2015*	Last day for filing oppositions to motions in limine and other non-
26		dispositive pre-trial motions;
27	February 20, 2015*	Last day for filing replies in support of motions in limine and other
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1 non-dispositive pre-trial motions;
 2 February 27, 2015* Hearing on motions in limine and other non-dispositive pre-trial
 3 motions, and final pre-trial conference;
 4 March 9, 2015* Trial(s).

5 *All deadlines marked with an asterisk do not apply to those actions that were filed
 6 outside of the N.D. Cal. and, following the Court's rulings on dispositive motions and Daubert
 7 motions, those actions will be returned to the courts in which they were originally filed.

8 All parties reserve the right to seek modification of the schedule based on the number of
 9 expert reports and the number of motions which will be filed, both of which are presently
 10 unknown.

11 * * *

12 The undersigned parties jointly and respectfully request that the Court enter this
 13 stipulation as an order.

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: _____

16 _____
 17 Hon. Samuel Conti
 18 United States District Judge

19 DATED: March 19, 2014

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2 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this
3 document has been obtained from each of the above signatories.
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